

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

IVAN SHANE STORZ,)	
Trustee of the I. Shane Storz Trust,)	
)	
DARLENE STORZ,)	Case No. 4:23-cv-01496-SEP
Trustee of the Darlene Storz Living Trust, and)	
)	
S. DARNEA WOOD,)	JOINT MOTION TO STRIKE
)	AND EXTEND TIME
Plaintiffs,)	
)	
vs.)	
)	
SOUTHERN AIRWAYS CORPORATION,)	
)	
Defendant.)	

Together, Plaintiffs Ivan Shane Storz, Darlene Storz, and S. Darnea Wood (“Plaintiffs”) and defendant Southern Airways Corporation (“SAC”) respectfully move the Court to:

(a) direct the Clerk of Court to ***strike*** Plaintiffs’ opposition memoranda of law at ECF Nos. [19](#), [20](#) and [21](#);

(b) ***extend*** the deadline to January 31, 2024 for Plaintiffs to file a new opposition memorandum of law; and

(c) ***extend*** the deadline to March 1, 2024 for SAC to file a reply thereto.

This is the first request for an extension. The purpose is to allow Plaintiffs to replace the documents at ECF Nos. [19](#), [20](#) and [21](#) with a single, shorter opposition memorandum, and to create a briefing schedule that accommodates obligations on the respective counsels’ calendars. The parties thank the Court for its attention to this motion.

Dated: Saint Louis, Missouri
January 17, 2024

Dated: New York, New York
January 17, 2024

S/ Donald E. Heck
LAW OFFICES OF DONALD E. HECK:
Donald E. Heck # ED24577
Donald E. Heck II # ED64489
13321 North Outer Forty Road
Chesterfield, Missouri 63107
Tel. (314) 786-1217
Fax (314) 786-1201
donheckatty@gmail.com
Attorneys for Plaintiffs

S/ Henry E. Jones
MORRISON-TENENBAUM, PLLC:
Henry E. Jones
Admitted Pro Hac Vice
87 Walker Street, Floor 2
New York, NY 10013
Tel: (212) 620-0938
Fax (646) 998-1972
henryj@m-t-law.com
Attorneys for Defendant